



February 27, 2012
Via ECFS Filing

Ms. Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

**RE: DBR360, Inc. – 499 Filer ID 825931
CY 2011 Annual CPNI Certification
EB Docket No. 06-36**

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2011 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009 (e) submitted on behalf of DBR360, Inc.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3004 or via email to rnorton@tminc.com. Thank you for your assistance in this matter.

Sincerely,

/s/ Robin Norton

Robin Norton
Consultant to DBR360, Inc.

cc: A. Saia – DBR360 (via email)
file: DBR360 - FCC - CPNI
tms: FCx1201

Enclosures
RN/sp

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

EB DOCKET 06-36

Annual 64.2009(e) CPNI Certification for: Calendar Year 2011

Name of Company covered by this certification: **DBR360, Inc.**

Form 499 Filer ID: 825931

Name of Signatory: David Baule

Title of Signatory: Chief Executive Officer

I, David Baule certify and state that:

1. I am CEO of DBR360, Inc. and, acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*
2. Attached to this certification, as Exhibit A, is an accompanying statement explaining how the Company's procedures ensure that the Company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in Section 64.2001 *et seq.* of the Commission's rules.
3. The Company has not taken any actions (i.e., proceedings instituted or petitions filed by the Company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.
4. The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.
5. The Company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The Company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.



David Baule, CEO
DBR360, Inc.

2/24/12

Date

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

EB DOCKET 06-36

DBR360, Inc.

Statement of CPNI Procedures and Compliance (2011)

DBR360 Inc. ("DBR360" or "Company") is a private telecommunications network provider and implements networks designed to address individual customer specifications. DBR360 provides private telecommunications services over dedicated lines to large enterprise and carrier customers pursuant to contracts and via sales through a dedicated account representative. DBR360's customer contracts uniformly contain confidentiality agreements that address customers' private information. It is DBR360's policy not to disclose CPNI except as specifically set out in its contracts with customers and where required by law. The Company primarily builds and manages private telecommunications networks for large organizations, firms with complex network needs, carriers, system integrators and cloud service providers. The Company's marketing efforts never include the use of CPNI nor does the Company provide any usage-sensitive services to customers.

DBR360 does retain CPNI information that relates to the quantity, technical configuration, type, destination, location and amount of use a telecommunications service subscribed to by its customers. However, the Company does not obtain, retain or use call detail records for marketing purposes.

DBR360 is committed to protecting the confidentiality of all customer information, including CPNI. The Company maintains all files containing CPNI in a secure manner such that they cannot be used, accessed, disclosed or destroyed by unauthorized employees or in an unauthorized manner. All customer information, including CPNI, is available through a password protected system with specific levels of access based on the individual employee's job need. Employees with a need for customer specific information, including CPNI, are granted access to the password protected system by individual department managers only. The Company prohibits such violations through employment agreements (which include prohibitions against unauthorized use, access, disclosure of customer information) and through other means which provide for disciplinary action for violations up to and including termination of employment. The provision of CPNI to any unrelated third party is strictly prohibited except for billing purposes and for the provision, maintenance and repair of services.

Statement of CPNI Procedures and Compliance (2011)

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The Company does not provide online access to CPNI or other data at this time. The Company does not provide services which involve call detail.

The Company does not have any retail locations and therefore does not maintain or disclose call detail records in-store.

The Company has procedures in place to notify law enforcement in the event of a breach of customers' CPNI, to ensure that notification is provided in the time period set forth in the FCC's rules, or if applicable, when so authorized by law enforcement. In addition, the Company has a process to record all breaches discovered and will provide notification to the United States Secret Service, FBI and customers, as required by applicable law.

The Company has not taken any actions against data brokers in the last year.

The Company did not receive any complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI, in calendar year 2011.

The Company has not developed any information with respect to the processes pretexters are using to attempt to access CPNI or call detail records.